

Response dated February 28, 2006
Reply to Office action of November 29, 2005

Serial No. 09/809,759
Docket No. ROC920000170US1
Firm No. 0021.0013

REMARKS/ARGUMENTS

Claims 1, 2, 4, 7, 8, 9, 11, 13, 19, 20, 25, 26, 27, 28, 29, 31, 37, 43, 44, and 47 are in the case. The applicants have studied the office action dated November 29, 2005 and believe the application is in condition for allowance. Reconsideration and reexamination are respectfully requested.

Claims 3, 5, 6, 10, 12, 14, 15-18, 21-24, 30, 32-36, 38-42, 45, 46 and 48-54 have been canceled without prejudice. Applicants reserve the right to pursue the subject matter of these claims in a continuation application.

Applicants gratefully acknowledge the Examiner's indication of the allowability of claims 9, 11, 13, 27, 29, 31, 44 and 47 if rewritten to be independent of a rejected claim. However, it is respectfully submitted that these claims are allowable as presently written as set forth below.

Claims 1-2, 4, 7-8, 19-20, 25-26, 28, 37 and 43 have been rejected under 35 U.S.C. Sec. 103(b) as being unpatentable over Montalbano, U.S. Pat. No. 5,918,237 in view of Anupam et al, U.S. Pat. No. 6535912. This rejection is respectfully traversed.

Claim 1, for example, is directed to a "computer implemented method for verifying a network address, comprising" *inter alia*, "accessing a network address included within a file; ... providing a substitute network address if the accessed content did not satisfy the qualifying threshold; receiving user selection of a provided substitute network address; and in response to said user selection, substituting within the file the user selected substitute network address for the accessed network address." It is noted that the Examiner has clearly failed to cite any teaching or suggestion, in either the Montalbano reference, or the Anupam reference, considered either alone, or in combination, of the recited "receiving user selection of a provided substitute network address; and in response to said user selection, substituting within the file the user selected substitute network address for the accessed network address" as required by claim 1. It is therefore respectfully submitted that the rejection of the claims should be withdrawn.

Moreover, the Examiner concedes that the Montalbano reference "does not specifically teach providing a substitute address if a threshold is not satisfied, and substituting accordingly." It appears to be the Examiner's position that this deficiency of the Montalbano reference is met by the Examiner's citations to the Anupam reference. More specifically the Examiner has cited the Anupam reference as teaching "heuristics for finding the best alternative match of a URL to

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be substituted accordingly” However, it is submitted that, in the Examiner’s citations, it is the heuristics, not any users, which determine whether a link is substituted in the system of the Anupam reference. The Examiner has failed to cite any portion of the Anupam reference which indicates a user is provided an opportunity to select a substitute link. Instead, it appears that the heuristics automatically select a substitute link if it can find one. Anapam, col. 10, lines 18 et seq. The Examiner has failed to cite any portion of the Anupam reference which indicates an address is substituted in response to a user selection. Thus, the Examiner has failed to cite any role of a user in the operations of the Montalbano or Anupam devices, which includes “receiving user selection of a provided substitute network address; and in response to said user selection, substituting within the file the user selected substitute network address for the accessed network address” as required by claim 1.

It is noted that the Examiner has cited one role of a user in the operation of the Montalbano device, that is, a user is provided the opportunity to “Click here to find out more.” The Examiner has cited no portion of the Montalbano or Anupam references which teaches or suggests that a user clicking on a video to learn more about a product will in any manner cause “substituting within the file the user selected substitute network address for the accessed network address” as required by claim 1. Indeed, if the user does click on the video, presumably the correct network address was accessed and there would be no motivation to substitute a different address. Conversely, if the user fails to click on the video, it is submitted that there would be no “receiving user selection of a provided substitute network address.”

It is further noted that the Examiner has cited one role of a user in the operation of the Anupam device. This is, it is the Examiner’s position that in the Anupam reference, a user is provided the opportunity to “confirm each step of a bookmark sequence.” This user input appears to be either a “proceed”, “pause” or “resume” playback command. Anapam, col. 12, lines 5 et seq. However, it appears that these commands do not have any effect as to whether or not a substitution is made. Instead, it is submitted that any substitution will have already occurred in accordance with the heuristics regardless of such commands from the user. Similarly, if the user fails to confirm a step of a bookmark sequence, it appears it will have no effect as to whether a substitution is done. Instead, it appears that any substitution will already have occurred. Thus, if the user fails to input a command, it appears that the sequence will simply stop if it is not being played in an auto playback mode. Thus, whether or not the user can be said to “confirm” a

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previously made substitution, such a "confirmation" appears to have no effect on whether or not a substitution is made to the sequence being played.

It is clear from the above, that the Examiner has cited no portion of the Montalbano or Anupam references which teaches or suggests "receiving user selection of a provided substitute network address" nor "in response to said user selection, substituting within the file the user selected substitute network address for the accessed network address" as required by claim 1. Thus, even if the references were combined in the manner suggested by the Examiner, a position disputed by the applicants, such a combination would clearly fail to provide the recited "receiving user selection of a provided substitute network address; and in response to said user selection, substituting within the file the user selected substitute network address for the accessed network address" as required by claim 1.

Independent claims 19 and 37 may be distinguished in a similar manner.

The rejection of the dependent claims is improper for the reasons given above. Furthermore, the dependent claims include additional limitations, which in combination with the base and intervening claims from which they depend provide still further grounds of patentability over the cited art.

The Examiner has made various comments concerning the obviousness of certain features of the present inventions. Applicants respectfully disagree. Applicants have addressed those comments directly hereinabove or the Examiner's comments are deemed moot in view of the above response.

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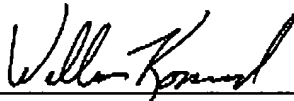
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Conclusion

For all the above reasons, Applicants submit that the pending claims 1, 2, 4, 7, 8, 9, 11, 13, 19, 20, 25, 26, 27, 28, 29, 31, 37, 43, 44, and 47 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 50-0585.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

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